REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-10, 15-18, 21-23 and 29-34 are pending in the present application, Claims 1, 6, 21, 22, and 29 having been amended, and Claims 30-34 having been added. Support for the present amendment is found, for example, Figs. 4, 7, 24, and 25, and at paragraphs [0019]-[0021], [0023]-[0025], [0049], [0059], and [0062]-[0064] of the originally filed specification. Applicant respectfully submits that no new matter is added.

In the outstanding Office Action, Claims 6, 7, 17, 18, and 21 were rejected under 35 U.S.C. §102(e) as anticipated by Chang et al. (U.S. Patent Publication No. 2004/0100976, hereinafter Chang); and Claims 1-5, 8-16, 19, 20, and 22-28 were rejected under 35 U.S.C. §103(a) as unpatentable over Chang in view of Kokado et al. (U.S. Patent Publication No. 2003/0115327, hereinafter Kokado).

Applicants' thank the Examiners for the courtesy of an interview extended to Applicants' representatives on June 23, 2010. During the interview, differences between the present invention and the applied art, and the rejections noted in the outstanding Office Action were discussed. No agreement was reached pending the Examiner's further review when a response is filed.

With respect to the rejection of Claim 6 as anticipated by Chang, Applicant respectfully submits that the amendment to Claim 6 overcomes this ground of rejection. Amended Claim 6 recites, *inter alia*,

> the address translation rule dictates a translation using a combination of a sending device address on the global network and destination address of the address translation apparatus on the global network to translate the destination address of the address translation apparatus on the global network to a destination addresses of the terminal or server on the private network, and

> if a combination of the sending device address and destination address included in a packet received at the WAN interface unit is identical to the combination of the sending device address on the global network and destination address of the address translation apparatus on the global network included in the address translation rule, the address translation unit translates the destination address of the packet received at the WAN to the destination address of the terminal or server on the private network.

Chang does not disclose or suggest every element of amended Claim 6.

In view of the interview, the claims are amended to more clearly describe and distinctly claim the subject matter regarded as the invention. Particularly, the claims are amended to more clearly indicate what was meant by the previously used terms of "associates" and "matches."

Chang provides a dynamic network address translation system. A first device 102 is in a public network, and sends packets to second device 103, which is in a private network. A NAPT router 104 is used to connect first device 102 and second device 103. The NAPT router 104 includes a NAPT table 106 that stores corresponding data of network address translation.[1] A translation data item is added to the table 106, wherein the "translation data item correspond to a destination network address translation, which makes [destination address-destination port] to be translated from [outer address 11:data port 108] to [second address 117:service port 109]."[2]

First device 102 sends a connection request packet 114, whose destination port is data port 108. This packet is routed to router 104, which translates the [destination address:destination port] to [second address 117:service port 109].[3]

In other words, the translation performed by router 104 of Chang does not involve the address of the sending device in the global network (first device 102). Rather, the translation is

[1] Chang, paragraph [0026].
[2] Chang, paragraph [0033].
[3] Chang, paragraph [0035].

based on the destination address:destination port (the public address and port of router 104) and the second address117:service port 109 (the private address of second device 103 and its port). The table 106 of Chang does not dictate a translation using a combination of a sending device address on the global network and destination address of the address translation apparatus on the global network to translate the destination address of the address translation apparatus on the global network to a destination addresses of the terminal or server on the private network. Furthermore, the translation in Chang is not conditioned upon a combination of the sending device address and destination address included in a packet received at the WAN interface unit being ***identical*** to the combination of the sending device address on the global network and destination address of the address translation apparatus on the global network included in the address translation rule.

Thus, Chang does not disclose or suggest the above-noted elements of amended Claim 6.

In view of the above-noted distinctions, Applicant respectfully submits that Claim 6 (and any claims dependent thereon) patentably distinguish over Chang. Claims 21 and 29 recite elements analogous to those of Claim 6. Thus, Applicant respectfully submits that Claims 21 and 29 patentably distinguish over Chang for at least the reasons stated for Claim 6.

Claim 1 recites, *inter alia*,

> the address translation rule dictates a translation using a combination of a sending device address on the global network and destination address of the relay apparatus on the global network to translate the destination address of the relay apparatus on the global network to a destination addresses of the terminal or server on the private network, and
>
> if a combination of the sending device address and destination address included in a packet received at the WAN interface unit is identical to the combination of the sending device address on the global network and destination address of the relay apparatus on the global network included in the address translation rule, the address translation unit

> translates the destination address of the packet received at the WAN to the destination address of the terminal or server on the private network.

Chang fails to disclose or suggest these features of amended Claim 1 for at least the reasons stated for Claim 6. Furthermore, Kokado fails to cure the deficiencies in Chang. The outstanding Office Action relies on Kokado to describe an "access control unit," and not the "address translation unit." Paragraphs [0191]-[0192] of Kokado describe an address conversion function. Particularly, paragraph [0192] states "converts the destination address GA and the destination port number 21 to an LA and an LP21 for the FTP server 2." However, this section of Kokado does not disclose or suggest the above-noted features of amended Claim 1.

In view of the above-noted distinctions, Applicant respectfully submits that Claim 1 (and any claims dependent thereon) patentably distinguish over Chang and Kokado, taken alone or in proper combination. Claims 11 and 22 recite elements analogous to those of Claim 1. Thus, Applicant respectfully submits that Claims 11 and 22 patentably distinguishes over Chang and Kokado, taken alone or in proper combination, for at least the reasons stated for Claim 1.

Consequently, in light of the above discussion and in view of the present amendment, the present application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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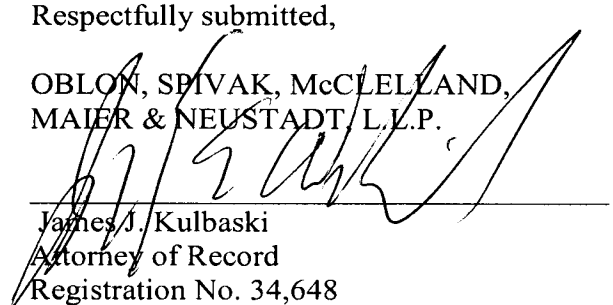

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